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Peter Robinson, Katherine Sebbane, and Rudy Barajas
Individually and on Behalf of All Those Similarly Situated*

16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA
18 SHANNON RAY, KHALA TAYLOR, PETER
ROBINSON, KATHERINE SEBBANE, and
19 RUDY BARAJAS Individually and on Behalf of
All Those Similarly Situated,

20 Plaintiffs,

21 v.

22 NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, an unincorporated association,

24 Defendant.

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13 Case No. 1:23-cv-00425

14 **PLAINTIFFS' NOTICE OF REQUEST
TO SEAL DOCUMENTS**

15 Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor
Date: March 3, 2025
Time: 1:30 PM

1 TO DEFENDANT AND ITS ATTORNEYS OF RECORD AND TO THE UNITED STATES
2 DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA:

3 Pursuant to Local Rule 141, please take notice that on November 1, 2024, Plaintiffs
4 Shannon Ray, Khala Taylor, Peter Robinson, Katherine Sebbane, and Rudy Barajas (“Plaintiffs”)
5 submitted the following documents by uploading to the “Box” application for United States
6 District Judge William B. Shubb and served by electronic mail the following documents on all
7 Defendants:

- 8 1. Plaintiffs’ Notice of Motion and Motion for Class Certification (Sealed Version);
- 9 2. Exhibit 1 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for
10 Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
11 Counsel;
- 12 3. Exhibit 27 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion
13 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
14 Counsel;
- 15 4. Exhibit 28 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion
16 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
17 Counsel;
- 18 5. Exhibit 29 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion
19 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
20 Counsel;
- 21 6. Exhibit 30 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion
22 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
23 Counsel;
- 24 7. Exhibit 31 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion
25 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
26 Counsel;

- 1 8. Exhibit 32 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 2 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 3 Counsel;
- 4 9. Exhibit 33 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 5 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 6 Counsel;
- 7 10. Exhibit 34 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 8 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 9 Counsel;
- 10 11. Exhibit 35 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 11 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 12 Counsel;
- 13 12. Exhibit 36 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 14 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 15 Counsel;
- 16 13. Exhibit 37 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 17 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 18 Counsel;
- 19 14. Exhibit 38 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 20 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 21 Counsel;
- 22 15. Exhibit 39 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 23 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 24 Counsel;
- 25 16. Exhibit 40 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
- 26 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
- 27 Counsel;

- 1 17. Exhibit 41 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
2 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
3 Counsel;
- 4 18. Exhibit 42 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
5 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
6 Counsel;
- 7 19. Exhibit 43 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
8 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
9 Counsel;
- 10 20. Exhibit 44 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
11 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
12 Counsel;
- 13 21. Exhibit 45 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
14 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
15 Counsel;
- 16 22. Exhibit 46 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
17 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
18 Counsel;
- 19 23. Exhibit 47 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
20 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
21 Counsel;
- 22 24. Exhibit 48 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
23 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
24 Counsel;
- 25 25. Plaintiff's Request to Seal; and
- 26 26. [Proposed] Order Granting Plaintiff's Request to Seal.

27 Plaintiffs' Request to Seal is made pursuant to Local Rule 141(b) and is based upon this
28 Request, all pleadings, papers, and records on file in this action, and any oral argument presented

1 to the Court. The Court may issue orders limiting disclosures of confidential information where
 2 compelling reasons exist. *See Pintos v. Pac. Creditors Ass'n*, 605 F.3d 665, 677-78 (9th Cir. 2010);
 3 *Felix v. Davis Moreno Constr., Inc.*, No. 07 Civ. 0533, 2008 WL 3009867, at *1-2 (E.D. Cal. Aug.
 4 1, 2008); E.D. Cal. L.R. 141. Plaintiffs make this request as required by the Stipulated Protective
 5 Order (ECF No. 56) because Plaintiffs' Notice of Motion and Motion for Class Certification and
 6 particular exhibits to the supporting Declaration of Michael Lieberman contain information
 7 designated "CONFIDENTIAL" or "ATTORNEYS' EYES ONLY" pursuant to the Stipulated
 8 Protective Order in this case.

9 Concurrent with the submission of this Request, Plaintiffs have filed versions of the above
 10 documents through the Court's CM/ECF system that contain redactions of information or materials
 11 that have been designated as Confidential or Attorneys' Eyes Only.

12 DATED: November 1, 2024

Respectfully submitted,

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